

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY


Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS PATELUNAS  
(MPA/USPS-T12-6-8)  
(November 26, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Patelunas (USPS-T-12).

Respectfully submitted,

  
James Pierce Myers

Counsel for  
MAGAZINE PUBLISHERS OF AMERICA, INC.

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**MPA/USPS-T12-6.** Had any Automated Flat Sorting Machine (AFSM) 100s been deployed as of the date the Postal Service completed the Phase II AFSM 100 decision analysis report (DAR)? If so, how many AFSM 100s had been deployed as of that date?

**MPA/USPS-T12-7.** Please refer to your response to MPA/USPS-T12-4(e) where you state, "I am informed that the Phase I AFSM [Automated Flats Sorting Machine] 100 DAR [Decision Analysis Report] targeted facilities that needed additional flat sorting capacity. To be included in the DAR, a site had to meet our minimum savings level."

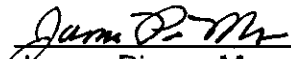
(a) What was the "minimum savings level" per machine (expressed either as a workhour savings per machine per year or cost savings per machine per year) required to be considered for an AFSM 100 in the Phase I AFSM 100 deployment?

(b) What was the maximum cost savings and workhour savings per machine per year that was calculated for any site for the Phase I AFSM 100 deployment?

**MPA/USPS-T12-8.** In USPS-LR-J-145, the Postal Service's "Rate Case Calculations" show that in Phase II of the Automated Flat Sorting Machine (AFSM) 100 deployment, the Postal Service will deploy only 334 machines while the description of the Phase II AFSM 100 deployment in this same worksheet indicates that in Phase II the Postal Service will deploy 362 AFSM 100s. Please indicate which of the Phase II machine deployment figures in USPS-LR-J-145 is correct and provide an explanation for the discrepancy between the two figures.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

  
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James Pierce Myers  
Counsel for  
MAGAZINE PUBLISHERS OF AMERICA, INC.

November 26, 2001  
Alexandria, VA